

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

GORGI NAUMOVSKI,

Defendant.

NOTICE OF MOTION TO
DISMISS THE INDICTMENT
FOR IMPOPER VENUE OR
TO TRANSFER THE CASE TO
THE MIDDLE DISTRICT OF
NORTH CAROLINA

No. 20 Cr. 384 (WFK)

PLEASE TAKE NOTICE, that upon the annexed memorandum of law, the defendant GORGI NAUMOVSKI, by his attorney MAKSIM NEMTSEV, will move the Court, before the Honorable William F. Kuntz II, United States District Judge for the Eastern District of New York, for an Order dismissing the indictment for improper venue under Fed. R. Crim. P. 12(b)(3)(A)(i) or transferring the case to the Middle District of North Carolina pursuant to Fed. R. Crim. P. 21(b).

DATED: BOSTON, MA
 July 17, 2023

/s/ Maksim Nemtsev
Maksim Nemtsev, Esq.
Mass. Bar No. 690826
20 Park Plaza, Suite 1000
Boston, MA 02116
(617) 227-3700
max@mnpclaw

TO: Andrew Estes
U.S. Department of Justice
271 Cadman Plaza East
Brooklyn, NY 11201

Patrick J Campbell
U.S. Attorney's Office Eastern District of New York
271-A Cadman Plaza East
Brooklyn, NY 11201